

Hendron Law Group
Lance J. Hendron, Esq.
Nevada Bar #11151
625 S. Eighth Street
Las Vegas, NV 89101
p. 702-710-5555
f. 702-710-8888
lance@hlg.vegas
Attorney for Defendant, Charles Parr (6)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MIRIAM ELIZABETH SUAREZ-
CONTRERAS
(1), aka "Ella" aka "Liz",
RAMIRO RAMIREZ-BARAJAS (2),
aka "Sergio",
ROBERTO BLANCAS-MATA (3),
aka "Carlos Delgado",
RAHDSMA HENDERSON (4), aka "Weezy"
STEPHEN LLOYD (5),
CHARLES PARR (6), aka "Charles
Magnuson",
DOUG STUMPF (7),
BRIAN SCARBOROUGH (8),
RENEA BARNES (9), aka "Renea Valdez",
QUENTIN ARMSTRONG (10),
CIPRIANO PINEDA-ACEDO (11),
JOSE GUILLERMO TELLO-ALBARRAN
12),
and MARTHA PEDRAZA-ZAMORA (13),

Defendants.

CASE NO. 2:19-cr-0133-APG-VCF

**STIPULATION AND ORDER TO
CONTINUE SENTENCING
(SECOND REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED by and between Melanee Smith, Assistant
2 United States Attorney, counsel for the United States of America, and Lance J. Hendron,
3 Esq., counsel for Defendant Charles Parr (6) that the sentencing currently scheduled for
4 March 23, 2023 at the hour of 1:30 p.m., be vacated and continued to a date and time more
5 convenient to the court but not less than ninety (90) days from the current sentencing
6 setting.

7 This Stipulation is entered into for the following reasons:

- 8 1. The parties agree to the continuance;
- 9 2. Defendant is currently out of custody and does not object to the continuance;
- 10 3. Defendant was recently released from the hospital;
- 11 4. The parties are continuing to work on, and gather materials relating to sentencing;
- 12 5. Additionally, denial of this requests for continuance could result in a miscarriage of justice.
- 13 6. The additional time requested by this Stipulation is excludable in computing the time
14 within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C.
15 §3161(h)(7)(A), when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and
16 3161(h)(7)(B)(iv).
- 17 7. The additional time requested herein is not sought for purposes of delay and the denial of
18 this request for continuance could result in a miscarriage of justice.
- 19 8. For all the above-stated reasons, the ends of justice would be best served by the continuance
20 of the sentencing.
- 21
- 22
- 23

24 ///

25 ///

26

27

28

1 9. This is the second request for a continuance of sentencing.

2 Dates this 17th day of March, 2023.

3 JASON FRIERSON
4 UNITED STATES ATTORNEY

5 /s/ Melanee Smith
6 MELANEE SMITH
Assistant United States Attorney

7 For Defendant Charles Parr (6)
8 /s/ Lance J. Hendron
9 Lance J. Hendron, Esq.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

CASE NO. 2:19-cr-0133-APG-VCF

Plaintiff,

vs.

MIRIAM ELIZABETH SUAREZ-
CONTRERAS

(1), aka "Ella" aka "Liz",

RAMIRO RAMIREZ-BARAJAS (2),

aka "Sergio",

ROBERTO BLANCAS-MATA (3),

aka "Carlos Delgado",

RAHDSMA HENDERSON (4), aka "Weezy"

STEPHEN LLOYD (5),

CHARLES PARR (6), aka "Charles

Magnuson",

DOUG STUMPF (7),

BRIAN SCARBOROUGH (8),

RENEA BARNES (9), aka "Renea Valdez",

QUENTIN ARMSTRONG (10),

CIPRIANO PINEDA-ACEDO (11),

JOSE GUILLERMO TELLO-ALBARRAN

12),

and MARTHA PEDRAZA-ZAMORA (13),

Defendants

FINDINGS OF FACTS, CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the court
hereby finds that:

///

///

///

CONCLUSIONS OF LAW

1. The parties agree to the continuance;
2. Defendant is currently out of custody and does not object to the continuance;
3. Defendant was recently released from the hospital;
4. The parties are continuing to work on, and gather materials relating to sentencing;
5. Additionally, denial of this requests for continuance could result in a miscarriage of justice.
6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).
7. The additional time requested herein is not sought for purposes of delay and the denial of this request for continuance could result in a miscarriage of justice.
8. For all the above-stated reasons, the ends of justice would be best served by the continuance of the sentencing.
9. This is the second request for a continuance of sentencing.

The ends of justice are served by granting said continuances and outweigh the best interest of the public and the Defendants' right to a speedy trial, since the failure to grant aid continuance would be likely result in a miscarriage of justice as it would deny the parties herein sufficient time, and the opportunity within which to effectively and thoroughly prepare and file pretrial motions, responses, and replies, and prepare for trial taking into account the exercise of due diligence.

///

///

ORDER

IT IS HEREBY ORDERED that the **Sentencing** in this matter scheduled for March 23, 2023, at the hour of 1:30 p.m., is hereby vacated and continued to the 21st day of June, 2023, at the hour of 9:30 a.m., in Courtroom 6C.



United States District Court Judge

DATED: March 20, 2023